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**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

VENUS YAMASAKI, individually and
 on behalf of all others similarly situated,

Plaintiff,

v.

ZICAM LLC, and MATRIXX
 INITIATIVES, INC.,

Defendants.

Case No.: 4:21-cv-02596-HSG

**STIPULATION AND ORDER
 REGARDING TIME FOR PLAINTIFF TO
 RESPOND TO CHURCH & DWIGHT CO.,
 INC.'S MOTION TO DISMISS AND FOR
 CHURCH & DWIGHT CO., INC. TO
 REPLY IN FURTHER SUPPORT**

Complaint Filed: April 9, 2021

First Amended Complaint Filed: June 10, 2021

Pursuant to Civil L.R. 6-2 and 7-12, the parties, through their undersigned counsel who are authorized to enter into this stipulation on their behalf, hereby stipulate and agree to a deadline by which Plaintiff Venus Yamasaki ("Plaintiff") shall file her opposition to the Motion to Dismiss (ECF No. 37), and by which Church & Dwight Co., Inc. shall file a reply in support of its Motion to Dismiss.

WHEREAS Plaintiff filed an Amended Complaint in this matter on June 10, 2021 (ECF No. 30);

WHEREAS Church & Dwight Co., Inc. filed a Motion to Dismiss on July 14, 2021 (ECF No. 37);

WHEREAS Plaintiff's opposition to the Motion to Dismiss is currently due July 28, 2021;

**STIPULATION AND ORDER REGARDING TIME FOR PLAINTIFF TO RESPOND TO CHURCH &
 DWIGHT CO., INC.'S MOTION TO DISMISS AND FOR CHURCH & DWIGHT CO., INC. TO REPLY
 IN FURTHER SUPPORT (CASE NO. 4:21-cv-02596-HSG)**

1 WHEREAS Church & Dwight Co., Inc.'s reply in support of its Motion to Dismiss is
2 currently due August 4, 2021;

3 WHEREAS Plaintiff requested a two-week extension to oppose the Motion to Dismiss due
4 to intervening deadlines in counsel's other cases, as well as the unavailability of counsel due to
5 previously scheduled travel plans;

6 WHEREAS Church & Dwight Co., Inc. does not object to Plaintiff's requested extension,
7 but the resulting deadline for Church & Dwight Co., Inc.'s reply in further support of its Motion
8 to Dismiss would conflict with its in-house and outside counsel's own previously scheduled travel
9 plans and work conflicts;

10 WHEREAS the parties therefore stipulated to an extension of time for Plaintiff to oppose
11 the Motion to Dismiss until August 11, 2021, and for Church & Dwight Co., Inc. to reply in support
12 of its Motion to Dismiss until September 1, 2021;

13 WHEREAS the parties have previously stipulated to extend the time for defendant to
14 respond to the initial complaint (ECF No. 18) and for plaintiff to file an amended complaint (ECF
15 No. 25), but the parties have not previously requested any time modifications in this case
16 concerning the pending motion to dismiss;

17 WHEREAS the parties do not expect the requested time modification to adversely impact
18 the schedule for the case, which has not yet been set; and

19 WHEREAS the parties request the court continue the August 19, 2021 hearing date for the
20 Motion to Dismiss to October 7, 2021, the Court's first available law and motion date per its
21 Scheduling Notes.

22 **NOW THEREFORE**, the parties through their undersigned counsel, hereby (1) stipulate
23 and agree that Plaintiff shall file her opposition to the Motion to Dismiss by August 11, 2021, and
24 Church & Dwight Co., Inc. shall reply in support of its Motion to Dismiss by September 1, 2021;
25 and (2) request that the Court reset the hearing date for the motion to dismiss for October 7, 2021.
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27
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1 Dated: July 21, 2021

2 **PROSKAUER ROSE LLP**

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Respectfully submitted,

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* *Pro hac vice* admission

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FILER'S ATTESTATION


I, Jonathan B. Cohen, am the ECF user whose identification and password are being used to file the Stipulation Regarding Time for Plaintiff to Respond to Church & Dwight Co. Inc.'s Motion to Dismiss and for Church & Dwight Co. Inc. to Reply in Support. In compliance with Local Rule 5-1(i)(3), I hereby attest that all signatories hereto concur in this filing.

By: /s/ Jonathan B. Cohen
Jonathan B. Cohen

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: 7/22/2021



THE HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Court Judge